

# EXHIBIT 1

## Exhibit 1

Plaintiffs object generally to any and all proposed Letters Rogatory cross-examination questions to the extent they are not relevant to the current litigation and to the extent they, either individually or cumulatively, are beyond the scope of discovery permitted by the Federal Rules of Civil Procedure or the Local Rules of the United States District Court for the District of Massachusetts and/or purport to impose duties and obligation beyond those rules. In addition to these general objections, Plaintiffs also state additional specific objections to the proposed Letters Rogatory cross-examination questions where appropriate. By setting forth such specific objections, Plaintiffs do not intend to limit or restrict the stated general objections.

By providing objections to Defendant's Letters Rogatory cross-examination questions, Plaintiffs expressly preserve all rights to object on any ground to the use of the answers to these questions, or their subject matter, at the trial of this action, as well as in any subsequent proceeding, including, without limitation objections as to competency, relevancy, materiality, and admissibility.

### Objections to Dexia Bank Belgium's Cross-Examination of René Avonts at Exhibit B-1

Question	Objection
342.	Vague and ambiguous; lack of foundation.
344.	Lack of foundation; leading question; calls for speculation.
345.	Lack of foundation; leading question; calls for speculation.
346.	Lack of foundation; leading question; calls for speculation.
347.	Lack of foundation; leading question; calls for speculation.
348.	Lack of foundation; leading question; calls for speculation.
351.	Lack of foundation.
352.	Lack of foundation; leading question; calls for speculation.
353.	Lack of foundation; leading question; calls for speculation.
354.	Lack of foundation; leading question; calls for speculation.
355.	Lack of foundation; leading question; calls for speculation.
357.	Lack of foundation; leading question; calls for speculation.
358.	Lack of foundation; leading question; calls for speculation.
361.	Assumes facts not in evidence.
361(a) (b)	Lack of foundation; calls for speculation.
361(c)	Lack of foundation; leading question; calls for speculation.
361 (d)	Lack of foundation; calls for speculation.
362	Lack of foundation; leading question; calls for speculation.
363.	Lack of foundation; leading question; calls for speculation.
364.	Lack of foundation; leading question; calls for speculation.
365.	Lack of foundation; leading question; calls for speculation.
366.	Lack of foundation; leading question; calls for speculation.
367.	Assumes facts not in evidence; lack of foundation; leading question.

<b>Question</b>	<b>Objection</b>
368.	Lack of foundation; leading question; calls for speculation.
369.	Lack of foundation; leading question; calls for speculation.
370.	Lack of foundation; leading question; calls for speculation.
373.	Lack of foundation; leading question; calls for speculation.
374.	Lack of foundation; leading question; calls for speculation.
375.	Lack of foundation; leading question; calls for speculation.
376.	Lack of foundation; leading question; calls for speculation.
377.	Lack of foundation; leading question; calls for speculation.
378.	Lack of foundation; leading question; calls for speculation.
379.	Lack of foundation.
381.	Lack of foundation.
382.	Lack of foundation.
383.	Lack of foundation; assumes facts not in evidence; leading question; calls for speculation.
384.	Lack of foundation; assumes facts not in evidence; leading question; calls for speculation.
385.	Lack of foundation; leading question; calls for speculation.
386.	Lack of foundation; leading question; calls for speculation.
387.	Lack of foundation; leading question; calls for speculation.
388.	Repetitive; already asked; lack of foundation.
389.	Repetitive; already asked; lack of foundation.
390.	Repetitive; already asked; lack of foundation.
391.	Lack of foundation.
392.	Lack of foundation; assumes facts not in evidence; calls for speculation.
393.	Lack of foundation; vague and ambiguous; assumes facts not in evidence; leading question; calls for speculation.
394.	Lack of foundation; leading question; calls for speculation.
395.	Lack of foundation; leading question; calls for speculation.
396.	Lack of foundation; leading question; calls for speculation.
397.	Lack of foundation; calls for speculation.
398.	Lack of foundation; vague and ambiguous; calls for speculation.
399.	Lack of foundation; leading question; calls for speculation.
400.	Lack of foundation; leading question; calls for speculation.
401.	Lack of foundation; leading question; calls for speculation.
402.	Lack of foundation; leading question.
403(a)	Leading question.
406.	Lack of foundation.
407.	Lack of foundation; leading question.
408 (a).	Leading question.
408 (b) and (c).	Lack of foundation; leading question.
409.	Lack of foundation; leading question.
410	Lack of foundation; leading question.
411	Lack of foundation; leading question.

**Objections to Dexia Bank Belgium's Cross-Examination of Geert Dauwe at Exhibit C-1**

<b>Question</b>	<b>Objection</b>
539.	Vague and ambiguous; lack of foundation.
542.	Lack of foundation; leading question; calls for speculation.
543.	Lack of foundation; leading question; calls for speculation.
544.	Lack of foundation; leading question; calls for speculation.
549.	Lack of foundation; leading question; calls for speculation.
550.	Lack of foundation; leading question; calls for speculation.
551.	Assumes facts not in evidence;
551. (b)	Lack of foundation; calls for speculation.
551. (c) (d)	Lack of foundation; calls for speculation.
552.	Lack of foundation; calls for speculation.
553.	Lack of foundation.
554.	Lack of foundation.
555.	Lack of foundation; leading question; calls for speculation.
556.	Lack of foundation; leading question; calls for speculation.
558.	Lack of foundation.
559.	Lack of foundation.
560.	Lack of foundation; leading question; calls for speculation.
561.	Lack of foundation; leading question; calls for speculation.
563.	Lack of foundation.
564.	Lack of foundation; assumes facts not in evidence; leading question.
566.	Lack of foundation; leading question; calls for speculation.
567.	Lack of foundation; leading question; calls for speculation.
568 (a)	Lack of foundation; leading question; calls for speculation.
568 (b)	Lack of foundation; leading question; calls for speculation; vague and ambiguous.
568 (c)	Lack of foundation; leading question; calls for speculation.
569.	Lack of foundation.
570.	Lack of foundation; vague and ambiguous.
571.	Lack of foundation; leading question.
572.	Lack of foundation; leading question; calls for speculation.
573.	Lack of foundation; leading question; calls for speculation.
574.	Lack of foundation; leading question; calls for speculation.
575.	Lack of foundation; assumes facts not in evidence; leading question.
576.	Lack of foundation; leading question; calls for speculation.
577.	Lack of foundation; leading question; calls for speculation.
578.	Lack of foundation; leading question; calls for speculation.
579.	Lack of foundation.
581.	Lack of foundation.
582.	Lack of foundation

<b>Question</b>	<b>Objection</b>
583.	Lack of foundation; assumes facts not in evidence; leading question; calls for speculation.
584.	Lack of foundation; assumes facts not in evidence; leading question; calls for speculation.
585.	Lack of foundation; leading question; calls for speculation.
586.	Lack of foundation; leading question; calls for speculation.
587.	Lack of foundation; leading question; calls for speculation.
588(c)	Lack of foundation; leading question; calls for speculation.
590.	Leading question.
591.	Leading question.
592.	Leading question.
593.	Lack of foundation.
594.	Lack of foundation.
596.	Lack of foundation.
597.	Lack of foundation.
598.	Lack of foundation; assumes facts not in evidence; calls for speculation.
599.	Lack of foundation; assumes facts not in evidence; calls for speculation.
600.	Lack of foundation; leading question; calls for speculation.
601.	Lack of foundation; leading question; calls for speculation.
602.	Lack of foundation; leading question; calls for speculation.
603.	Lack of foundation; calls for speculation.
604.	Lack of foundation; vague and ambiguous; calls for speculation.
605.	Lack of foundation; leading question; calls for speculation.
606.	Lack of foundation; leading question; calls for speculation.
607.	Lack of foundation; leading question; calls for speculation.

**Plaintiffs' Objections to Dexia Bank Belgium's Cross-Examination of Eric De Gyns at Exhibit D-1**

<b>Question</b>	<b>Objection</b>
104.	Lack of foundation; vague and ambiguous.
106(b)	Lack of foundation; vague and ambiguous.
107.	Lack of foundation; leading question.
108.	Lack of foundation; leading question; the document speaks for itself.
109.	Lack of foundation.
110.	Leading question; the document speaks for itself
111.	Lack of foundation.
112.	Leading question; the document speaks for itself.
113.	Lack of foundation; leading question.
114.	Assumes facts not in evidence; lack of foundation; leading

Question	Objection
	question.
115.	The document speaks for itself.
116.	Lack of foundation; assumes facts not in evidence.

**Plaintiffs' Objections to Dexia Bank Belgium's Cross-Examination of Patrick Faict at Exhibit E-1**

Question	Objection
70.	Lack of foundation; vague and ambiguous.
72.	Lack of foundation; leading question; calls for speculation.
73.	Lack of foundation; leading question; calls for speculation.
74.	Lack of foundation; leading question; calls for speculation.
77.	Lack of foundation; leading question; calls for speculation.
78.	Lack of foundation; leading question; calls for speculation.
79.	Assumes facts not in evidence.
79 (b)	Lack of foundation; calls for speculation.
79 (c) (d)	Lack of foundation; calls for speculation.
80.	Lack of foundation.
81.	Lack of foundation.
82.	Lack of foundation; leading question; calls for speculation.
83.	Lack of foundation; leading question; calls for speculation.
86.	Lack of foundation.
87.	Lack of foundation; leading question; calls for speculation.
88.	Lack of foundation; leading question; calls for speculation.
89.	Lack of foundation; leading question; calls for speculation.
90.	Lack of foundation; leading question; calls for speculation.
91.	Lack of foundation; leading question; calls for speculation.
92.	Lack of foundation.
93.	Lack of foundation.
94.	Lack of foundation.
96.	Lack of foundation; assumes facts not in evidence; leading question; calls for speculation.
97.	Lack of foundation; assumes facts not in evidence; leading question; calls for speculation.
98.	Lack of foundation; leading question; calls for speculation.
99.	Lack of foundation; leading question; calls for speculation.
100.	Lack of foundation; leading question; calls for speculation.
104.	Leading question; the document speaks for itself.
106.	Lack of foundation; vague and ambiguous.
107.	Lack of foundation; vague and ambiguous.

**Plaintiffs' Objections to Dexia Bank Belgium's Cross-Examination of Jan Van Broekhoven at Exhibit F-1**

<b>Question</b>	<b>Objection</b>
96.	Vague and ambiguous; lack of foundation.
98.	Lack of foundation; leading question; calls for speculation.
99.	Lack of foundation; leading question; calls for speculation.
100.	Lack of foundation; leading question; calls for speculation.
101.	Leading question.
102.	Lack of foundation; leading question; calls for speculation.
103.	Lack of foundation; leading question; calls for speculation.
104.	Assumes facts not in evidence;
104 (b)	Lack of foundation; calls for speculation.
104 (c) (d)	Lack of foundation; calls for speculation.
105.	Lack of foundation.
106.	Lack of foundation.
107.	Lack of foundation.
108.	Lack of foundation; leading question; calls for speculation.
109.	Lack of foundation; leading question; calls for speculation.
110.	Lack of foundation; leading question; calls for speculation.
111.	Lack of foundation; leading question; calls for speculation.
112.	Lack of foundation; leading question; calls for speculation.
113.	Lack of foundation; leading question; calls for speculation.
114.	Lack of foundation; leading question; calls for speculation.

**Plaintiffs' Objections to Dexia Bank Belgium's Cross-Examination of Jan Van Der Ven at Exhibit G-1**

<b>Question</b>	<b>Objection</b>
151.	Vague and ambiguous; lack of foundation.
153.	Lack of foundation.
155.	Lack of foundation.
156.	Lack of foundation.
157.	Lack of foundation; assumes facts not in evidence; leading question; calls for speculation.
158.	Lack of foundation; assumes facts not in evidence; leading question; calls for speculation.
159.	Lack of foundation; leading question; calls for speculation.
160.	Lack of foundation; leading question; calls for speculation.
161.	Lack of foundation; leading question; calls for speculation.
162 (c)	Lack of foundation; leading question; calls for speculation.
165.	Leading question.
166.	Leading question.

<b>Question</b>	<b>Objection</b>
.167.	Leading question.
168.	Leading question.
169.	Lack of foundation.
170.	Lack of foundation.
172.	Lack of foundation.
173.	Lack of foundation.
174.	Lack of foundation; assumes facts not in evidence; calls for speculation.
175.	Lack of foundation; vague and ambiguous; assumes facts not in evidence; leading question; calls for speculation.
176.	Lack of foundation; leading question; calls for speculation.
177.	Lack of foundation; leading question; calls for speculation.
178.	Lack of foundation; leading question; calls for speculation.
179.	Lack of foundation; calls for speculation.
180.	Lack of foundation; vague and ambiguous; calls for speculation.
181.	Vague and ambiguous.
182.	Assumes facts not in evidence; lack of foundation; leading question.
183.	Vague and ambiguous.
184.	Assumes facts not in evidence; lack of foundation; leading question.
185.	Vague and ambiguous.
186.	Lack of foundation; leading question; calls for speculation.
187.	Lack of foundation; leading question; calls for speculation.
188.	Lack of foundation; leading question; calls for speculation.
189.	Lack of foundation; leading question.
190.	Assumes facts not in evidence; lack of foundation; leading question.
191.	Lack of foundation; leading question; calls for speculation.
192.	Lack of foundation; leading question; calls for speculation.
193.	Lack of foundation; leading question; calls for speculation.
194.	Lack of foundation; leading question; calls for speculation.
195.	Lack of foundation; leading question; calls for speculation.
196.	Lack of foundation; leading question; calls for speculation.
197.	Lack of foundation; leading question; calls for speculation.